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STUART GOLD

July 19, 2021

VIA ECF

The Honorable Margo K. Brodie  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Ng Chong Hwa a.k.a Roger Ng, 18 Cr. 538 (MKB)

Dear Judge Brodie:

We write on behalf of Mr. Ng with the consent of Pretrial Services to request a change in Mr. Ng's ankle monitor. Currently, Mr. Ng is subject to an 8:00 am to 8:00 pm curfew. His current ankle monitor, a GPS monitor, is large, heavy and impedes Mr. Ng's only form of exercise—running. When Mr. Ng exercises, the device's weight and size causes discomfort and irritation to his ankle. We respectfully request that the Court allow Pretrial Services to change Mr. Ng's monitor to the home guard monitor, which Pretrial Services also uses. The home guard monitor gives Pretrial Services the ability to ensure Mr. Ng complies with his curfew and is smaller and more lightweight. Switching to this unit would eliminate Mr. Ng's discomfort while exercising.

As mentioned, Pretrial Services Officer Bianca Carter consents to this request. The Government opposes this request.

BRAFMAN & ASSOCIATES, P.C.

Thank you for your continued attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Marc A. Agnifilo', written in a cursive style.

Marc A. Agnifilo, Esq.

Zach Intrater, Esq.

Teny R. Geragos, Esq.

Jacob Kaplan, Esq.

cc: Counsel for the Government (via ECF and email)  
Pretrial Services Officer Bianca Carter (via email)